

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TELECOM BUSINESS SOLUTION, LLC,
LATAM TOWERS, LLC, and AMLQ HOLDINGS
(CAY) LTD.,

Petitioners,

v.

TERRA TOWERS CORP. and TBS
MANAGEMENT, S.A.,

Respondents.

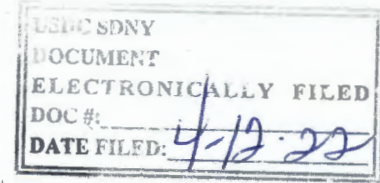
TERRA TOWERS CORP., TBS MANAGEMENT,
S.A., and DT HOLDINGS, INC.

Cross-Petitioners,

v.

TELECOM BUSINESS SOLUTION, LLC,
LATAM TOWERS, LLC, and AMLQ HOLDINGS
(CAY) LTD.,

Cross- Respondents.



No. 22-cv-1761-LAK

NOTICE OF UNOPPOSED MOTION TO UNSEAL EXHIBITS

PLEASE TAKE NOTICE that upon the accompanying Declaration of George W. Kroup in Support of Respondents' Unopposed Motion to Seal, Respondents/Cross-Petitioners Terra Towers Corp., TBS Management, S.A. (together, "Terra"), and DT Holdings, Inc. ("DTH"), by and through undersigned counsel, hereby move this Court for an Order directing that all documents currently filed under seal be unsealed and made available on the public docket, specifically the documents with docket entries ECF Nos. 1 to 9-22, inclusive, and ECF Nos. 32-1 to 32-48, inclusive.

SO ORDERED

[Signature]
LEWIS A. KAPLAN, USDJ

4/12/22

Dated: New York, New York
April 11, 2022

LAW OFFICES OF JOHN F. BAUGHMAN, PLLC

By: /s/ George W. Kroup

John F. Baughman
George W. Kroup
299 Broadway – Suite 1816
New York, New York 10007
(212) 548-3212

- and -

CAREY RODRIGUEZ MILIAN, LLP

Juan J. Rodriguez
1395 Brickell Avenue, Suite 700
Miami, Florida 33131
(305) 356-5486
Admitted Pro Hac Vice

*Attorneys for Respondents/Cross-Petitioners Terra
Towers Corp., TBS Management S.A., and DT
Holdings, Inc.*